DECLARATION OF Ex. 6 Personal Privacy (PP)

Pursuant to 28 U.S.C. § 1748, I declare under penalty of perjury that the subsequent is true and correct:

- 1. My name is **Ex. 6 Personal Privacy (PP)** African-American resident of Acworth, Georgia. I was born, raised, and lived in the Ashurst Bar/Smith community in Tallassee, Alabama until approximately 1988, when I moved to Tennessee for employment. While in Tallassee, my family and I lived at **Ex. 6 Personal Privacy (PP)**Ex. 6 Personal Privacy (PP). I have not moved back to Tallassee since that time because I have not come across employment opportunities there. But my friends and family members, such as my cousins Ex. 6 Personal Privacy (PP), still live in the Ashurst Bar/Smith community.
- 2. I remember from my childhood that gardening was very common in the Ashurst Bar/Smith community. We are a community of hardworking people who were taught and became accustomed to living off the land, raising livestock, and growing crops like cotton and corn. I distinctly remember the smell of the fresh earth when it was planting season and the delicious smell and taste of the fresh fruits and vegetables that we grew. My family did not have much, but we had our cotton, corn, cows, and pigs. The garden was located at our [Ex. 5 Personal Privacy (PP)] property.
- 3. Since the Landfill has come into our community, my family members and other members of the community fear that gardening and raising livestock is no longer safe. As a result, many people have given up on these traditions.
- 4. The smells that come from the Landfill and its methane flare are horrific and overpowering. I smell these when I go home to visit my family and friends.
- 5. Whenever I go home, I also notice that the roads are rough and unmaintained, and the garbage trucks drive down these roads very fast. I worry for my family and community members that it is unsafe for them to be on these roads with the trucks going by so fast.
- 6. I also often notice water being discharged from the Landfill from a pipe that is between Ex. 6 Personal Privacy (PP). Photographs of this pipe are attached here in Attachment 1. This water is discharged into a waterway that flows down to the residential area of our community. Photographs of this waterway are attached in Attachment 1. The water flows to a catch basin and, eventually, into the woods. Photographs of this catch basin and adjoining woods are attached in Attachment 1. I am concerned that this discharge may be contaminated, and could be affecting the health of community members.
- 7. The Landfill attracts vermin such as buzzards that lessen the quality of life of the Ashurst Bar/Smith community. Photographs of buzzards flying above the Landfill are attached in Attachment 1.
- 8. The Ashurst Bar/Smith community is and always will be my home. I had plans to build my dream home there for my retirement so that I could enjoy the family land and spend time with my family and friends in the community. But I have no desire to retire to the Ashurst Bar/Smith community if the Landfill is in operation, fouling our air and water and changing our ways of life.

Privileged & Confidential Attorney Client Work Product

Executed on _______ day of August 2016.

Ex. 6 Personal Privacy (PP)





Please visit:

Ex. 6 Personal Privacy (PP)

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